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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

EVGENI KOPANKOV,

Defendant.

**Case No.:** CR 19–178 JSC

**PARTIES’ JOINT PROPOSED  
STATEMENT OF THE OFFENSE**

**Court:** Courtroom F, 15th Floor

**Hearing Date:** May 15, 2023

**Hearing Time:** 8:30 p.m.

Pursuant to the Court’s instructions at the second pretrial conference on May 10, 2023, attorneys for the government and the defense have met and conferred and jointly submit the following proposed statement of the offense:

This case involves allegations of a conspiracy to kidnap and rob a man of proceeds of marijuana growing. Mr. Kopankov is charged with being part of the conspiracy, or agreement. He is presumed not guilty and may not be found guilty unless the government proves his guilt beyond a reasonable doubt and twelve jurors unanimously agree that all of the elements of the offense have been proven beyond a reasonable doubt.

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2 Dated: May 11, 2023

Respectfully submitted,

3 JODI LINKER  
4 Federal Public Defender  
5 Northern District of California

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